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UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	ED CR 19-27-RGK
)	
Plaintiff,)	<u>GOVERNMENT'S EXHIBIT LIST</u>
)	
v.)	Trial: September 10, 2024
)	Time: 8:30 a.m.
USA HAPPY BABY INC.,)	
MICHAEL WEI YUEH LIU, AND)	
JING DONG,)	
)	
Defendants.)	

The government submits its exhibit list.

Date: September 9, 2024

/s/ Gregory W. Staples
GREGORY W. STAPLES
Assistant U.S. Attorney

UNITED STATES v. USA HAPPY BBY, INC., et al.

Case No. CR 19-27-RGK

EXHIBIT LIST

NOTE: Exhibits that are in Chinese consist of the translation first followed by the original document in Chinese. The original document will be used for identification and to show to witnesses who do not speak English. The government will move to admit only the translated portion of the exhibit.

Ex No.	Description	Stip. To Admiss.	Date Identified	Date admitted
1.	Document entitled "About Us" - translation	Y		
1A	Document entitled "About Us" in Chinese	NA		
2.	Document entitled "Room Arrangement Email" - translation	Y		
2A	Document entitled "Room Arrangement Email" in Chinese	NA		
3.	Travel and Birth Chart	Y		
4.	Document entitled "Giving Birth in the US Q&A" - translation	Y		
4A	Document entitled "Giving Birth in the US Q&A" in Chinese	NA		
5.	Chase Bank Statement for Mr. Michael W.	Y		

Ex No.	Description	Stip. To Admiss.	Date Identified	Date admitted
	Liu covering dates 12/24/13- 01/24/14			
6.	Untitled document with photo of woman before American flag - translation	Y		
6A	Untitled document with photo of woman before American flag in Chinese	NA		
7.	Document entitled "Why Give Birth in the US" - translation	Y		
7A	Document entitled "Why Give Birth in the US" in Chinese	NA		
8.	Document entitled "Maternity Hotel Consultation and Service Agreement"; version 2 - translation	Y		
8A	Document entitled "Maternity Hotel Consultation and Service Agreement"; version 2 in Chinese	NA		
9.	Email dated 2/1/2013 from Phoebe Hotmail to Eric Lu -	Y		

Ex No.	Description	Stip. To Admiss.	Date Identified	Date admitted
	translation			
9A	Email dated 2/1/2013 from Phoebe Hotmail to Eric Lu in Chinese	NA		
10.	Email dated 12/13/2012 from USA Happy Baby to Tom Zhang Wei -translation	Y		
10A	Email dated 12/13/2012 from USA Happy Baby to Tom Zhang Wei in Chinese	NA		
11.	Email dated 2/22/2013 from Phoebe Dong to Michael Chen - translation	Y		
11A	Email dated 2/22/2013 from Phoebe Dong to Michael Chen in Chinese	NA		
12A	Email dated 6/28/2011 from Phoebe Dong to Wenhong - translation	Y		
12A.A	Email dated 6/28/2011 from Phoebe Dong to Wenhong in Chinese	NA		
12B	Attachment to 12A: Document entitled "Sharing experience of traveling to the United States -	Y		

Ex No.	Description	Stip. To Admiss.	Date Identified	Date admitted
	customs clearance" - translation			
12B.A	12B-Attachment to 12A: Document entitled "Sharing experience of traveling to the United States - customs clearance" in Chinese	NA		
13A	Email dated 4/13/2012 from Phoebe Hotmail to Yongbo Liu - translation	Y		
13A.A	Email dated 4/13/2012 from Phoebe Hotmail to Yongbo Liu' in Chinese	NA		
13B	Document entitled "Sharing Experience of Traveling to the United States" - translation	Y		
13B.A	Document entitled "Sharing Experience of Traveling to the United States" in Chinese	NA		
13C	Document entitled "Phoebe Baby Self- Service Prenatal Hotel in Los Angeles, USA" -	Y		

Ex No.	Description	Stip. To Admiss.	Date Identified	Date admitted
	translation			
13C.A	Document entitled "Phoebe Baby Self-Service Prenatal Hotel in Los Angeles, USA" in Chinese	NA		
14.	Email dated 4/3/2013 from Phoebe Hotmail to Eric Lu - translation	Y		
14A	Email dated 4/3/2013 from Phoebe Hotmail to Eric Lu in Chinese	NA		
15.	Email dated 1/24/2013 from USA Happy Baby to Joanna Yao - translation	Y		
15A	Email dated 1/24/2013 from USA Happy Baby to Joanna Yao in Chinese	NA		
16A	Email dated 12/19/2012 from Phoebe Hotmail to Eric Lu - translation	Y		
16A.A	Email dated 12/19/2012 from Phoebe Hotmail to Eric Lu in Chinese	NA		
16B	Photo of Homeland Security Departure Card	Y		

Ex No.	Description	Stip. To Admiss.	Date Identified	Date admitted
16C	Passport Photo of Hu Haifei	Y		
17.	Email dated 4/21/2013 from Phoebe Hotmail to Eric Lu - translation	Y		
17A	Email dated 4/21/2013 from Phoebe Hotmail to Eric Lu in Chinese	NA		
18.	Email dated 3/15/2012 from Phoebe Hotmail to Dongli Tang - translation	Y		
18A	Email dated 3/15/2012 from Phoebe Hotmail to Dongli Tang in Chinese	NA		
19.	Email dated 4/16/2011 from Waxbaby to Phoebe Dong - translation	Y		
19A	Email dated 4/16/2011 from Waxbaby to Phoebe Dong in Chinese	NA		
20.	Email dated 10/15/2014 from usahappybaby2651 to newbird11 - translation	Y		
20A	Email dated 10/15/2014 from usahappybaby2651 to newbird11 in Chinese	NA		

Ex No.	Description	Stip. To Admiss.	Date Identified	Date admitted
21.	Organization Chart - translation	Y		
21A	Organization Chart in Chinese	NA		
22.	Email dated 12/12/2011 from Phoebe Hotmail to Eason - translation	Y		
22A	Email dated 12/12/2011 from Phoebe Hotmail to Eason in Chinese	NA		
23.	Email dated 11/27/2011 from melodychen2007 to US Phoebe Maternity house - translation	Y		
23A	Email dated 11/27/2011 from melodychen2007 to US Phoebe Maternity house in Chinese	NA		
24.	Email dated 9/28/2011 from Phoebe Dong to Wenhong - translation	Y		
24A	Email dated 9/28/2011 from Phoebe Dong to Wenhong in Chinese	NA		
25.	Document: USA Happy Baby Inc. (1) Short-Term Housing Reservation Agreement; (2)	Y		

Ex No.	Description	Stip. To Admiss.	Date Identified	Date admitted
	Housing Reservation Confirmation - translation			
25A	Document: USA Happy Baby Inc. (1) Short-Term Housing Reservation Agreement; (2) Housing Reservation Confirmation in Chinese	NA		
26.	Email from USA Happy Baby to Joanna Yao entitled "Premium Suite" - translation	Y		
26A	Email from USA Happy Baby to Joanna Yao entitled "Premium Suite" in Chinese	NA		
27.	Document entitled "Dear Mommies and Families" - translation	Y		
27A	Document entitled "Dear Mommies and Families" in Chinese	NA		
28.	PowerPoint entitled "Phoebe Baby Enterprise Management Consulting (Tianjin) Co., Ltd." - translation	Y		

Ex No.	Description	Stip. To Admiss.	Date Identified	Date admitted
28A	PowerPoint entitled "Phoebe Baby Enterprise Management Consulting (Tianjin) Co., Ltd." in Chinese	NA		
29.	Brochure - translation	Y		
29A	Brochure in Chinese	NA		
30.	Certificate - translated	Y		
30A	Certificate in Chinese	NA		
31.	Bank records re transfer of \$49,100 on 8/28/2014 [Count 18]	Y		
32.	Bank records re transfer of \$49,100 on 8/28/2014 [Count 19]	Y		
33.	Bank records re transfer of \$19,985 on 9/2/2014 [Count 20]	Y		
34.	Bank records re transfer of \$154,025 on 9/25/2014 [Count 21]	Y		
35.	Bank records re transfer of \$25,432 on 10/10/2014 [Count 22]	Y		

Ex No.	Description	Stip. To Admiss.	Date Identified	Date admitted
36.	Bank records re transfer of \$16,300 on 10/27/2014 [Count 23]	Y		
37.	Bank records re transfer of \$18,183 on 12/19/2014 [Count 24]	Y		
38.	Bank records re transfer of \$3,379 on 12/26/2014 [Count 25]	Y		
39.	Bank records re transfer of \$49,911.04 on 2/3/2015 [Count 26]	Y		
40.	Bank records re transfer of \$49,911.04 on 2/3/2015 [Count 27]	Y		
41.	Promotional Fan - translation	Y		
41A	Promotional Fan in Chinese	NA		
42.	Document entitled "Youmei-US Maternity Hotel" - translation	Y		
42A	Document entitled "Youmei-US Maternity Hotel" in Chinese	NA		
43.	Business Card			

Ex No.	Description	Stip. To Admiss.	Date Identified	Date admitted
43A	Business Card in Chinese	NA		
44.	Version 2 of translation of business card	Y		
44A	Business Card in Chinese	NA		
45.	Blank			
46.	Blank			
47.	Resume re: Liu, Wei Yueh, Michael	Y		
48.	Booklet titled "Pre-Departure Guide" - translation	Y		
48A	Booklet titled "Pre-Departure Guide" in Chinese	NA		
49.	You Mei three photos - translation			
49A	You Mei three photos in Chinese	NA		
50.	Document that begins with "Contract Effectiveness, Payment and Refund" - translation			
50A	Document that begins with "Contract Effectiveness, Payment and Refund" in	NA		

Ex No.	Description	Stip. To Admiss.	Date Identified	Date admitted
	Chinese			
51.	Payment Receipt for Zhou, Bo dated 10/28/14 - translation			
51A	Payment Receipt for Zhou, Bo dated 10/28/14 in Chinese	NA		
52.	Payment Receipt for Zhou, Bo dated 11/26/14 - translation			
52A	Payment Receipt for Zhou, Bo dated 11/26/14 in Chinese	NA		
53.	Document entitled "CEAC DS-160 Report" re: Zhou, Bo dated 11/10/14	Y		
54.	Zhou, Bo Passport			
55.	Zhou, Bo Visa			
56.	Boarding Pass to LA dated 1/18/15 for Bo Zhou			
57.	Document entitled "Ms. Zhou and Her Husband's Flight Airline ticket Inquiry 1211" - translation			
57A	Document entitled "Ms. Zhou and Her Husband's Flight Airline ticket Inquiry 1211" in	NA		

Ex No.	Description	Stip. To Admiss.	Date Identified	Date admitted
	Chinese			
58.	USA Happy Baby receipt number 01130 for customer Bo Zhou - translation			
58A	USA Happy Baby receipt number 01130 for customer Bo Zhou in Chinese	NA		
59.	Document entitled "Youmei-Maternity Hotel-Hi-End Travel to US for Birthing" - translation			
59A	Document entitled "Youmei-Maternity Hotel-Hi-End Travel to US for Birthing" in Chinese	NA		
60.	Lulu handwritten note acknowledging receipt of \$2000 - translation			
60A	Lulu handwritten note acknowledging receipt of \$2000 in Chinese	NA		
61.	Bank records re transfer of \$49,100 on 8/28/2014 [Count 18]	Y		
62.	Bank records re transfer of \$49,100 on	Y		

Ex No.	Description	Stip. To Admiss.	Date Identified	Date admitted
	8/28/2014 [Count 19]			
63.	Bank records re transfer of \$19,985 on 9/2/2014 [Count 20]	Y		
64.	Bank records re transfer of \$154,025 on 9/25/2014 [Count 21]	Y		
65.	Bank records re transfer of \$25,432 on 10/10/2014 [Count 22]	Y		
66.	Bank records re transfer of \$16,300 on 10/27/2014 [Count 23]	Y		
67.	Bank records re transfer of \$18,183 on 12/19/2014 [Count 24]	Y		
68.	Chase Bank Statement for Jing Dong covering dates 8/19/14-9/17/14 [Counts 18, 19]	Y		
69.	Bank records re transfer of \$49,911.04 on 2/3/2015 [Counts 26, 27]	Y		
70.				
71.				